

Fill in this information to identify the case:

Debtor 1 Christopher L. Banton

Debtor 2 Jervonda Banton
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA

Case number 18-15582 PMM

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: MidFirst Bank

Court claim no. (if known): 11-2

Last 4 digits of any number you use to identify the debtor's account: 8900

Property address:

314 Wolfenden Avenue
Darby, PA 19023

Part 2: Prepetition Default Payments

Check one:

☐ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☒ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ 864.64

Part 3: Postpetition Mortgage Payment

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>5,555.06</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ 960.68
c. Total. Add lines a and b.	(c)	\$ <u>6,515.74</u>

Creditor asserts that the debtor(s) are contractually obligated for 12 / 01 / 2022
the postpetition payment(s) that first became due on:

Debtor(s) Christopher L. Banton and Jervonda Banton
First Name Middle Name Last Name

Case Number (if known): 18-15582 PMM

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

*/s/ Denise Carlon

Date 05/16/2023

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor



Loan Number:

Teller:

Case Number: 18-15582

Loan Type: 2

Date: 5/15/2023

Filing Date: 8/23/2018

Investor: MIDFIRST BANK

Name: BANTON

NSF FEE

Date Incurred	Date Billed	Fee Amount	Last Activity	Remaining Balance	Detail
2/5/2019	2/5/2019	\$15.00	00/00/00	\$15.00	nsf fees in ppfn filed 3/21/19
6/10/2019	6/10/2019	\$15.00	00/00/00	\$15.00	nsf fees in ppfn filed 3/21/19

BANKRUPTCY ATTORNEY FEE

Date Incurred	Date Billed	Fee Amount	Last Activity	Remaining Balance	Detail
5/30/2019	8/16/2019	\$1,031.00	12/29/2022	\$864.64	MFR fees/cost

EXPENSE ADVANCES

Date Incurred	Date Billed	Fee Amount	Last Activity	Remaining Balance	Detail
11/1/18, 10/31/18	1/16/2019	\$930.68	00/00/00	\$930.68	pcc/obj fees in ppfn filed 3/21/19

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Christopher L. Banton
Jervonda Banton a/k/a Jervonda L
Malachi**
Debtor(s)

MidFirst Bank
Movant
vs.

**Christopher L. Banton
Jervonda Banton a/k/a Jervonda L
Malachi**
Debtor(s)

Kenneth E. West
Trustee

BK NO. 18-15582 PMM

Chapter 13

Related to Claim No. 11-2

**CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Denise Carlon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on May 16, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)
Jervonda Banton a/k/a Jervonda L Malachi
314 Wolfenden Avenue
Darby, PA 19023

Christopher L. Banton
314 Wolfenden Avenue
Darby, PA 19023

Attorney for Debtor(s) (via ECF)
Brad J. Sadek, Esq.
Sadek and Cooper
1500 JFK Boulevard, Ste 220
Philadelphia, PA 19102

Trustee (via ECF)
Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Method of Service: electronic means or first-class mail.

Dated: May 16, 2023

/s/ Denise Carlon
Denise Carlon, Esq.
Attorney I.D. 317226
KML Law Group, P.C.
BNY Mellon Independence Center
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Philadelphia, PA 19106
(215) 627-1322
decarlon@kmlawgroup.com